

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DIBY AKO

PLAINTIFF

vs.

No. 3:22-cv-1751-S

**ARRIVA BEST SECURITY, INC.,
and AMOIFO KOFFI**

DEFENDANTS

**PLAINTIFF DIBY AKO'S FIRST SET OF
WRITTEN DISCOVERY TO DEFENDANT ARRIVA BEST SECURITY, INC.**

Plaintiff Diby Ako ("Plaintiff"), by and through his attorney Josh Sanford of Sanford Law Firm, PLLC, and for his First Set of Interrogatories, Request for Production, and Requests for Admission to Separate Defendant Arriva Best Security, Inc. ("Defendant"), pursuant to Rules 33, 34, and 36 of the Federal Rules of Civil Procedure, to be answered within thirty days after service of this request, does hereby state as follows:

I. GENERAL INSTRUCTIONS AND DEFINITIONS

1. Each answer shall be made separately, fully in writing, and should be provided by delivering or mailing them to the offices of Sanford Law Firm, PLLC, Kirkpatrick Plaza, 10800 Financial Centre Pkwy, Suite 510, Little Rock, Arkansas 72211, or if sent via email, to sean@sanfordlawfirm.com and josh@sanfordlawfirm.com.

2. These requests are continuing in nature for all information that is now or may hereafter become known or available to Defendants until the date of compliance with this request or trial, whichever is later, unless otherwise stated. Defendant should respond

with additional information subsequent to its initial responses as and whenever such additional information is acquired, located, or comes into existence.

3. If you must qualify a response or deny only a part of the matter to which an admission is requested, specify so much of the request as is true and qualify or deny the remainder.

4. "Plaintiff" refers to Diby Ako.

5. The terms "you," "your," "yours," and "Defendant" are intended to mean Arriva Best Security, Inc., unless otherwise specifically indicated.

6. The conjunctions "and" and "or" shall be interpreted to mean "and/or," and shall not be interpreted to exclude any information otherwise within the scope of any request.

II. PLAINTIFF'S INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT ARRIVA BEST SECURITY, INC.

INTERROGATORY NO. 1. State Defendant's annual gross volume of sales made or business done for each of the three calendar years preceding the filing of this lawsuit.

REQUEST FOR PRODUCTION NO. 1. If Defendant contends that its annual gross volume of sales made or business done for any of the three calendar years preceding the filing of this lawsuit was less than \$500,000.00, for each such year, produce true copies of all documents and tangible things relating to Interrogatory No. 1, including, but not limited to: (1) tax filings and returns for each of the three calendar years preceding the filing of this lawsuit; (2) balance sheets or statements of financial position, which show Defendant's assets, liabilities, and ownership equity at any point in each of the three calendar years preceding the filing of this lawsuit; (3) income statements for each of the

three calendar years preceding the filing of this lawsuit, and “income statements” means statements of comprehensive income, statements of revenue and expense, P&L, profit and loss reports, revenue statements, statements of financial performance, earnings statements, operating statements, statements of operations, or statements of cash flows, which show Defendant’s revenues and expenses; (4) loan applications made by Defendant during all of the three calendar years preceding the filing of this lawsuit; and (5) cash flow statements or statements of cash flows for each of the three calendar years preceding the filing of this lawsuit, and “cash flow statements” means financial statements that show how changes in balance sheet accounts and income affect cash and cash equivalents, and breaks the analysis down to operating, investing and financing activities, or in other words, shows the flow of cash in and out of the business; (6) account statements from bank accounts owned by Defendant at any time during the three years preceding the filing of this lawsuit; and (7) financial statements for each of the three calendar years preceding the filing of this lawsuit, and “financial statements” means a formal record of the financial activities of a business.

INTERROGATORY NO. 2. State the types of security services Defendant provides and the city and state in which Defendant has provided these services in the three years preceding the filing of this lawsuit.

REQUEST FOR PRODUCTION NO. 2. Produce true copies of all documents and things showing the city and state of residence of each and every individual or company for which Defendant provided security services, the method by which each and every guest booked their room or rooms, and the dates for which each and every guest booked their room or rooms, during all times in which Plaintiff was employed with Defendant.

INTERROGATORY NO. 3. Identify each and every state and country in which Defendant advertised its services, and identify each and every medium of advertisement and the name of any publication or publisher for each state and country, from six years prior to Plaintiff's start date through the end of Plaintiff's employment with Defendant.

**III. PLAINTIFF'S REQUESTS FOR ADMISSIONS TO
DEFENDANT ARRIVA BEST SECURITY, INC.**

REQUEST FOR ADMISSION NO. 1. Admit that Defendant's annual gross volume of sales made or business done has been greater than \$500,000.00 for each of the three calendar years preceding the filing of this lawsuit.

REQUEST FOR ADMISSION NO. 2. Admit that Defendant has two or more employees engaged in security services.

REQUEST FOR ADMISSION NO. 3. Admit that Defendant provides security services in all 50 states.

REQUEST FOR ADMISSION NO. 4. Admit that Defendant provides security services for athletic events attended by persons who reside outside of the state in which the event takes place.

REQUEST FOR ADMISSION NO. 5. Admit that Defendant regularly contacts employees across state lines to direct their duties and give assignments.

Respectfully submitted,

PLAINTIFF DIBY AKO

SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Telephone: (800) 615-4946
Facsimile: (888) 787-2040

/s/ Josh Sanford
Josh Sanford
Tex. Bar No. 24077858
josh@sanfordlawfirm.com

CERTIFICATE OF SERVICE

I, Josh Sanford, do hereby certify that on December ____, 2024, a true and correct copy of the foregoing discovery was sent via U.S. Mail and electronic mail to the *pro se* party named below:

Arriva Best Security Inc.
c/o Aimee Koffee
5482 Wilshire Blvd. Ste. 219
Los Angeles, CA 90036

Amoifo Koffee
9955 Durant Drive, Unit 304
Beverly Hills, CA 90212-1601

Arriva Best Security Inc.
2435 N. Central Express Way, 12th Floor
Richardson, Texas 75080

/s/ Josh Sanford
Josh Sanford